

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
AT PORTLAND

ROBERT ALEXANDER GRIMSLEY
Plff,

vs.

NIKE, INC.;

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Civil Action No. L:25-CV-184 AA

CIVIL RICO
COMPLAINT

*** JURY TRIAL DEMANDED ***

AMAZON.COM, INC.; MICROSOFT, INC.; DARIGOLD, INC.; FACEBOOK, INC.; META CORP; NYSDA, INC.; SATELLITE INDUSTRIES, INC.;
BEST PETS INC.; TD AMERITRADE, INC.; APPLE, INC.; C. FIVERE; C. WAGNER; E. REYES; HEIDI STEWARD; BETHANY SMITH;
T. WELSH; JOHN & JANE DOES (ALL SHAREHOLDERS, BROKERS, STAKEHOLDERS, AIDERS, ABETTERS, PROFITTERS, PARTICIPANTS &
CONDUCTORS TO THE RICO; DIRECTLY AND INDIRECTLY.); ELLEN ROSENBLUM; TINA KOTEK; CITY OF SALEM, OR.; COUNTY OF
MARSON, OR.

DEFENDANTS.

1. THIS IS A CIVIL ACTION AUTHORIZED BY 18 U.S.C. § 1964 TO REDRESS THE INJURIES TO BUSINESS & PROPERTY & CONSTITUTIONAL VIOLATIONS (§1983) SUSTAINED FROM 1962 PROHIBITED ACTIVITIES IN A RICO CONSPIRACY. ID. 1962(d).
2. THE U.S. DISTRICT COURT FOR THE DISTRICT OF OREGON IS AN APPROPRIATE VENUE UNDER 18 U.S.C. § 1965, WHICH MAY BE INSTITUTED AGAINST "ANY PERSON... FOR ANY DISTRICT WHICH SUCH PERSON RESIDES, IS FOUND, HAS AN AGENT, OR TRANSACTS HIS AFFAIRS[.]" ID. § 1965. VENUE APPLICATION UNDER TITLE 28 DOES NOT APPLY TO RICO. SEE 28 U.S.C. § 1391(a).

3. PLAINTIFF HAS BEEN KIDNAPPED AND TRAFFICKED BY DEFENDANTS' ENTERPRISE SINCE 2018 UNDER THESE CIRCUMSTANCES: A SIMULATION OF LAWFUL INCARCERATION OR DETAINMENT - INCLUDING SIMULATED ARRESTS. IN APRIL OF 2018 ASSOCIATES TIM WELSH, BETHANY SMITH, & HEIDI STEWARD INPUTED PLTF AS AN ADULT IN CUSTODY ("ASC") DATA TEXT & OBJECT ON THE ENTERPRISES INFORMATION SYSTEM SOFTWARE THATS COMMUNICATED OVER A WIDE AREA NETWORK (WAN), WHICH DIRECTS AND COORDINATES FRONTLINE ASSOCIATES TO USE LETHAL FORCE (AGAINST PLTF) AT FACILITIES WITHIN THE ORGANIZATION. THESE PREDICATE ACTS BY ABOVE-NAMED ASSOCIATES ARE IN FURTHERANCE OF DEFENDANTS' ENTERPRISE, WHICH WORKS COHESIVELY TO PROFIT & PROVIDE LOGISTICAL SUPPORT IN THE FACILITATION OF THE LONG-TERM KIDNAPPING OF PL'S CORPUS WITH THE DISTRIBUTION OF THEIR PRODUCTS & SERVICES INTO THE MANSTEALING FACILITIES AND/OR SCHEME EXECUTION THEREOF.
4. AS A RESULT OF DEFENDANTS' RACKETEERING, PLTF HAD A VEHICLE REPOSSESSED AND HAS BEEN UNABLE TO SEEK CASUAL EMPLOYMENT WHILE KIDNAPPED; PLTF IS PHYSICALLY AND PSYCHOLOGICALLY UNDEVELOPED DUE TO LACK OF STIMULUS TO THE SENSES/LIFE EXPERIENCES; PLTF HAS PTSD FROM THE LONG-TERM KIDNAPPING & BEATINGS BY ASSOCIATES OF DEFENDANTS' ENTERPRISE, CHRONIC COVID FROM SARS AT THEIR MANSTEALING FACILITIES, AND IS PHYSICALLY & MENTALLY DISABLED - UNABLE TO FUNCTION IN MODERN SOCIETY. PL'S CONSTITUTIONAL RIGHTS WERE VIOLATED WITH DECEIT AND ACTUAL MALICE BY DEFENDANTS' SIMULATION TO CONCEAL & DISGUISE THEIR 1962 PROHIBITED ACTIVITIES; NAMELY, PL'S 1ST, 4TH, 8TH, 13TH, 14TH CONST. AMENDMENTS, INCLUDING THE VIOLATION OF PL'S REPRODUCTIVE RIGHTS BY RESTRICTING HIS REPRODUCTIVE ACT (SEX) WITH WOMEN DURING CAPTIVITY, AND THE STRIPPING OF PL'S IDENTITY AS A FATHER TO HIS CHILDREN SECURED UNDER THE 14TH.

THEREFORE, PLAINTIFF DEMANDS JUDGMENT AGAINST DEFENDANTS' ENTERPRISE FOR \$10 TRN, PLUS COSTS.

IRREPARABLE INJURY

WITHOUT IMMEDIATE HELP FROM THE COURT IN ACCORDANCE WITH RULE 65 - GIVEN THE FACTS STATED IN THIS VERIFIED COMPLAINT - AND ITS AUTHORITY GRANTED UNDER RICO TO PREVENT & RESTRAIN 1962 ACTIVITY; THE PLAINTIFF WILL REMAIN KIDNAPPED AND TRAFFICKED BY DEFENDANTS' ENTERPRISE. HE CURRENTLY IS KEPT IN A CELL AT THE ORGANIZATIONS INFAMOUS DEATH ROW BUILDING THATS CONDEMNED: FIRE HAZARD, BROKEN CELL DOORS, ELECTRICAL & PLUMBING PROBLEMS: BLACKOUTS, FECAL MATTER FLOODS, NO RUNNING WATER FOR 44 HOURS ON 12/28-12/30 (2024).

VERIFICATION

I HEREBY CERTIFY UNDER PENALTY OF PERJURY
THAT THE FACTS PLEADED IN THIS COMPLAINT
ARE TRUE & CORRECT.

EXECUTED IN SALEM, OREGON ON JANUARY 22ND, 2025.

Robert Grimsley

DATED: 1/22/25

RESPECTFULLY SUBMITTED,

Robert Grimsley

ROBERT A. GRIMSLEY
PRO SE

SERVICE

I, ROBERT GRIMSLEY, CERTIFY THAT ON DATE 1-28-25, I MAILED THIS
VERIFIED COMPLAINT THROUGH THE FRONTLINE ASSOCIATES OF DEFENDANTS'
MANSTEALING ENTERPRISE INTO THE UNITED STATES DISTRICT COURT, FOR THE
DISTRICT OF OREGON - AT PORTLAND. ADDRESSED TO: CLERK OF COURT,
U.S. DISTRICT COURT, 1000 SW 3RD AVE # 740, PORTLAND OR. 97204.

UNDER PENALTY OF PERJURY,

Robert Grimsley 1-28-25

Oregon Department of Corrections - ~~AK~~ Mail
Institution OSP SID 21089091
Name ROBERT GRIMSLEY
Address 2605 STATE ST.
City SALEM State OR Zip 97310

PORTLAND OR RPDC 972

30 JAN 2025 PM 5 L



CLERK OF COURT
UNITED STATES DISTRICT COURT
1000 SW 3RD AVE # 740
PORTLAND, OR. 97204

NOTICE

ODOC MAIL RULE HAS CHANGED.

<https://www.oregon.gov/DOC>

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